FACT SHEET FOR ADDING RECLAIMED WATER CONDITIONS AS A PERMIT MODIFICATION TO PERMIT ST (or WA)

FACILITY NAME XXXXX XXXXX XXXX XXXX

SUMMARY

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INTRODUCTION

This fact sheet is a companion document to the draft modifications to State/NPDES Permit No. **ST (or WA)**The Department of Ecology (the Department) is proposing to modify this permit to include conditions ("R Conditions") which allows the beneficial use of reclaimed water. No other conditions in the permit are proposed for modification. This fact sheet explains the nature of the proposed reclamation and reuse treatment, distribution and use(s), the Department's decisions on limiting the pollutants in the reclaimed water, and the regulatory and technical bases for those decisions.

The Reclaimed Water Act, Chapter 90.46 RCW, authorized the development of Water Reclamation and Reuse Standards for the beneficial use of reclaimed water. These standards were completed in 1997. All reclaimed water permits issued by the Department of Ecology must specify conditions demonstrating that the wastewater has been adequately and reliably treated to meet the requirements in the Water Reclamation and Reuse Standards, 1997, appropriate for the use. In addition to meeting the water quality limitations, the standards require specific treatment and disinfection requirements beyond those of most conventional wastewater treatment facilities. The standards also require automated alarms, redundancy of treatment units, emergency storage, stringent operator training requirements and public notification of reclaimed water use.

Under the Reclaimed Water Act, RCW 90.46.040, a permit is required for land application of reclaimed water. The permit is issued to the generator of the reclaimed water who may then distribute the water subject to the permitted provisions governing the location, rate, water quality and purposes of use. The permit is issued by Ecology under the authority of Chapter 90.48 RCW which requires that a permit be issued before any discharge of pollutants to waters of the state is allowed (RCW 90.48.080 and 90.48.162). RCW 90.46.030 states that the Department of Health may issue a permit for industrial and commercial uses of reclaimed water and that the permits will govern the location, rate, water quality and purposes of use. Per memorandum of agreement between the Department of Ecology and the Department of Health, DOH requirements are included in a single permit issued by Ecology

In addition to the Water Reclamation and Reuse Standards, regulations adopted by the State include procedures for issuing permits (Chapter 173-216 WAC), technical criteria for discharges from municipal wastewater treatment facilities (Chapter 173-221 WAC) and water quality criteria for ground waters (Chapter 173-200 WAC). The Reclaimed Water Act, the Water Reclamation and Reuse Standards and these regulations also establish the basis for effluent limitations and other requirements which are to be included in the permit.

This fact sheet and draft permit "R Conditions", are available for review by interested persons as described in Appendix A--Public Involvement Information.

The fact sheet and draft permit "R Conditions", have been reviewed by the Washington State Department of Health and by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties

submitting comments will receive a copy of the Department's response. Changes to the permit will be addressed in Appendix D--Response to Comments

GENERAL INFORMATION		
Applicant		
Facility Name and Address		
Type of Reclamation Treatment System:		
Discharge Location	Latitude:°'" N Longitude:°'" W.	
Legal Description of Use Area(s)	Section, township, range Latitude:°'" N. Longitude:°'" W. If several use areas, describe generally	
Contact at Facility	Name: Telephone #:	
Responsible Official	Name: Title: Address: Telephone #: FAX #	

BACKGROUND INFORMATION

DESCRIPTION OF THE RECLAMATION TREATMENT AND DISTRIBUTION SYSTEM

TREATMENT PROCESSES

The Water Reclamation and Reuse Standards require the generator of the reclaimed water to either have an Ecology delegated industrial wastewater treatment program or all industries discharging into the generator's wastewater collection system shall have current waste discharge permits issued by Ecology.

DISTRIBUTION SYSTEM AND USE AREA

RESIDUAL SOLIDS

The treatment facilities remove solids during the treatment of the wastewater at the headworks (grit and screenings), and at the primary and secondary clarifiers, in addition to incidental solids (rags, scum, and other debris) removed as part of the routine maintenance of the equipment. Grit, rags, scum and screenings are drained and disposed of as solid waste at the local landfill. To prevent water quality problems the Permittee is required in permit condition S7. to store and handle all residual solids (grit, screenings, scum, sludge, and other solid waste) in accordance with the requirements of RCW 90.48.080 and State Water Quality Standards.

The final use and disposal of sewage sludge from this facility is regulated by U.S. EPA under 40 CFR 503. The disposal of other solid waste is under the jurisdiction of the _?_ County Health Department.

GROUND WATER

PERMIT STATUS

The previous permit for this facility was issued on ?..

An application for water reclamation and reuse was submitted to the Department on _?_ and accepted by the Department on _? .

SUMMARY OF COMPLIANCE WITH THE PREVIOUS PERMIT

The facility last received an inspection on _?_. <u>A compliance inspection with sampling (or without sampling) was conducted on _?_.</u>

During the history of the permit, the Permittee has remained in compliance based on Discharge Monitoring Reports (DMRs) and other reports submitted to the Department and inspections conducted by the Department.

RECLAIMED WATER CHARACTERIZATION

The concentration of pollutants expected in the reclaimed water was reported in the permit application and in the engineering report. The reclaimed water prior to use is characterized for the following parameters:

Table 1: Reclaimed Water Characterization

<u>Parameter</u>	Concentration
Biochemical Oxygen Demand	
Total Suspended Solids	
Dissolved Oxygen	
рН	
Total Nitrogen as N	
Turbidity	
Total Coliform	

SEPA COMPLIANCE

WATER RIGHTS STATUS

The Permittee is considered the generator of the reclaimed water and RCW 90.46.120 gives the Permittee exclusive right to any water generated by the wastewater treatment facility. Use and distribution of reclaimed water is exempted from the water right permit requirements of RCW 90.03.250 and 90.44.060.

PROPOSED PERMIT LIMITATIONS (R1)

The Reclaimed Water Act, Chapter 90.46 RCW requires that reclaimed water be adequately and reliably treated prior to distribution and beneficial use. State regulations require that limitations set forth in a permit issued under Chapter 90.48 RCW must be either technology- or water quality-based. Municipal wastewater must also be treated using all known, available, and reasonable treatment (AKART) and not pollute the waters of the State. The minimum criteria to demonstrate compliance with these requirements are derived from the *Water Reclamation and Reuse Standards* and Chapter 173-221 WAC.

The permit also includes limitations on the quantity and quality of the reclaimed water (land applied or infiltrated to recharge groundwater via surface percolation)that have been determined to protect the quality of the ground water. The approved engineering report includes specific design criteria for this facility. Water quality-based limitations are based upon compliance with the Ground Water Recharge Criteria (RCW 90.46.080) which are the drinking water standards for the parameters noted and the Ground Water Quality Standards (Chapter 173-200 WAC) for other parameters that require regulation.

The more stringent of the water quality-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring all known available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). All reclaimed water permits must assure that the effluent has been adequately and reliably treated so that as a result of that treatment, it is suitable for a beneficial use or controlled use that would not otherwise occur and is no longer considered a wastewater (RCW 90.46.010(40)

The authority and duties for reclaimed water use are in addition to those already provided in law with regard to sewage and wastewater collection, treatment and disposal for the protection of public health and the safety of the state's waters. All waste discharge permits issued by the Department must specify conditions requiring all known available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). For land application, the permit requires the reclaimed water to be applied at agronomic rates.

The <u>Water Reclamation and Reuse Standards</u>, 1997, outline the requirements for the additional level of treatment technology as well as water quality limits necessary for public health protection during the use of reclaimed water. The standards provide four classes of reclaimed water, Classes A, B, C and D.

This facility produces Class A reclaimed water. Class A is the highest quality of reclaimed water and therefore provides the broadest range of reuse opportunities. Conversely, Class A reclaimed water requires the most stringent treatment and water quality limitations. The technology and water quality requirements for the production of Class A reclaimed water are as follows:

"Class A Reclaimed Water" is reclaimed water that had been adequately and reliably treated and, at a minimum is, at all times, an oxidized, coagulated, filtered and disinfected wastewater.

- 1. Oxidized is defined as wastewater in which the organic matter has been stabilized such that the biochemical oxygen demand (BOD $_5$) does not exceed 30 mg/L and total suspended solids (TSS) does not exceed 30 mg/L, is nonputrescible and contains dissolved oxygen.
- 2. Coagulated wastewater is defined as an oxidized wastewater in which colloidal and finely divided suspended matter have been destabilized and agglomerated prior to filtration by the addition of chemicals or by an equally effective method.
- 3. Filtered wastewater is defined as an oxidized, coagulated wastewater which has been passed through natural undisturbed soils or filter media, such as sand or anthracite, so that the turbidity as determined by an approved laboratory method does not exceed an average operating turbidity of 2 nephelometric turbidity units (NTU), determined monthly, and does not exceed 5 NTU at any time.

- 4. Adequate disinfection is defined as the median number of total coliform organisms in the wastewater after disinfection does not exceed 2.2 per 100 milliliters, as determined from the bacteriological results of the last seven (7) days for which analyses have been completed, and the number of total coliform organisms does not exceed 23 per 100 milliliters in any sample.
- 5. A 0.5 mg/L chlorine residual shall be maintained in the reclaimed water during conveyance from the reclamation facility to the use areas.

This facility produces Class (B,C, D) reclaimed water. The technology and water quality requirements for the production of Class (B,C, D) reclaimed water are as follows:

"Class (B,C, D) Reclaimed Water" is reclaimed water that had been adequately and reliably treated and, at a minimum is, at all times, an oxidized and disinfected wastewater.

- 1. Oxidized is defined as wastewater in which the organic matter has been stabilized such that the biochemical oxygen demand (BOD₅) does not exceed 30 mg/L and total suspended solids (TSS) does not exceed 30 mg/L, is nonputrescible and contains dissolved oxygen.
- 2. Adequate disinfection is defined as the median number of total coliform organisms in the wastewater after disinfection does not exceed 2.2 per 100 milliliters, as determined from the bacteriological results of the last seven (7) days for which analyses have been completed, and the number of total coliform organisms does not exceed 23 per 100 milliliters in any sample.
- 3. A 0.5 mg/L chlorine residual shall be maintained in the reclaimed water during conveyance from the reclamation facility to the use areas.

GROUND WATER QUALITY-BASED EFFLUENT LIMITATIONS

RCW 90.46.080 states that reclaimed water may be beneficially used for ground water recharge via surface percolation provided that it meets the Groundwater Recharge Criteria as measured in the ground water beneath or down gradient of the recharge project site. The groundwater recharge criteria are defined in 90.46.010 as the contaminant criteria found in the drinking water quality standards adopted by the State Board of Health pursuant to chapter 43.20 RCW and the Department of Health pursuant to Chapter 70.119A RCW. The primary drinking water standards are listed below. Drinking water is the beneficial use generally requiring the highest quality of ground water. Providing protection to the level of drinking water standards will protect a great variety of existing and future beneficial uses

Table 2: Primary Drinking Water Standards

Table 2. I filliary Diffiking water Standards	
Parameter	Concentration
Nitrate as N	$10~\mathrm{mg/L}$
Nitrite as N	1 mg/L
Arsenic	50 μg/L

Cadmium	5 μg/L
Chromium	$100 \mu g/L$
Fluoride	2 mg/L
Mercury	2 μg/L
Nickel	$100 \mu g/L$
Total Trihalomethanes (TTHM)	0.10 mg/L

RCW 90.46.080 further states that if the Ground Water Recharge Criteria do not contain a standard for a constituent or a contaminant, the Department of Ecology shall establish a discharge limit consistent with the goals of the Reclaimed Water Act. In order to protect existing water quality and preserve the designated beneficial uses of Washington's ground waters including the protection of human health, WAC 173-200-100 states that waste discharge permits shall be conditioned in such a manner as to authorize only activities that will not cause violations of the Ground Water Quality Standards. Additional ground water criteria as defined in Chapter 173-200 WAC and in RCW 90.48.520 for this discharge include the following:

TABLE 3	Additional Ground Water Quality Criteria
Parameter	Concentration
Total Dissolved Solids	$500~\mathrm{mg/L}$
Chloride	$250~\mathrm{mg/L}$
Sulfate	$250~\mathrm{mg/L}$
Copper	$1300~\mu \mathrm{g/L}$
Lead	15 μg/L
Manganese	$50 \mathrm{\mu g/L}$
Silver	100 μg/L
Zinc	$5000~\mu\mathrm{g/L}$
рН	6.5 to 8.5 standard units
Total Iron	0.3 mg/L
Toxics	No toxics in toxic amounts

MONITORING REQUIREMENTS (R2)

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, that ground water criteria are not violated, and that reclaimed water limitations are being achieved

RECLAIMED WATER MONITORING

The monitoring and testing schedule is detailed in the proposed permit under Condition R2. Specified monitoring frequencies take into account the quantity and variability of the reclaimed water, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

Monitoring for _?_ is being required to further characterize the reclaimed water. <u>This/These</u> pollutant(s) could have a significant impact on the quality of the ground water.

CROP MONITORING

SOIL MONITORING

VADOSE ZONE MONITORING

GROUND WATER MONITORING

The monitoring of ground water at the site is required in accordance with the Ground Water Recharge Criteria and the Ground Water Quality Standards, Chapter 173-200 WAC. The Department has determined that a potential to pollute the ground water may exist. Therefore the Permittee is required to evaluate the impacts on ground water quality. Monitoring of the ground water at the site boundaries and within the site is an integral component of such an evaluation.

REPORTING AND RECORDKEEPING (R3)

The conditions of R3. are based on the authority to specify appropriate reporting and recordkeeping requirements to prevent and control the distribution or use of inadequately treated wastewater.

RECLAIMED WATER DISTRIBUTION AND USE (R4)

These permit requirements are based on the Water Reclamation and Reuse Standards authorized in Chapter 90.46 RCW. The standards contain requirements to assure that distribution and use of reclaimed water are protective of public health and the environment at all times. These include prohibitions on bypass, alarms and storage or alternative disposal of substandard water, maintenance of operational records, cross connection control, use area restrictions and enforceable contracts and a local reclaimed water use ordinance.

OPERATIONS AND MAINTENANCE (R5)

The proposed permit contains condition R.5. as authorized under the Water Reclamation and Reuse Standards and RCW 90.48.110, WAC 173-220-150, Chapter 173-230 WAC, and WAC 173-240-080. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture, treatment and protection of public health and the environment.

RECOMMENDATION FOR PERMIT ISSUANCE

This proposed permit modification meets all statutory requirements for authorizing the beneficial use of reclaimed water, including those limitations and conditions believed necessary to control toxics, and to protect human health and the beneficial uses of waters of the State of Washington.

REFERENCES FOR TEXT AND APPENDICES

Washington State Department of Ecology, 1993. <u>Guidelines for Preparation of Engineering</u> <u>Reports for Industrial Wastewater Land Application Systems</u>, Ecology Publication # 93-36. 20 pp.

Washington State Department of Ecology and Department of Health, 1997. <u>Water Reclamation and Reuse Standards</u>, Ecology Publication # 97-23. 73 pp.

Washington State Department of Ecology 1998. Chapter E-1, <u>Criteria For Sewage Works Design</u>, Ecology Publication # 98-37. 50 pp

Washington State Department of Ecology, 1996. <u>Implementation Guidance for the Ground Water Quality Standards</u>, Ecology Publication # 96-02.

Washington State Department of Health, 1994. <u>Design Criteria for Muncipal Wastewater Land Treatment</u>, 10 pp

APPENDICES

APPENDIX A--PUBLIC INVOLVEMENT INFORMATION

The Department has tentatively determined to issue a permit modification to the applicant listed on page one of this fact sheet. The permit modification contains reclaimed water (R) conditions and limitations which are described in the rest of this fact sheet.

Public notice of application was published on (date) and (date) in (name of publication) to inform the public that an application had been submitted and to invite comment on the issuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on (date) in (name of publication) to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
? Regional Office
?.

Any interested party may comment on the draft permit "R conditions" or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

The Department will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. The Department's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone, _?_, or by writing to the address listed above

This fact sheet and permit were written by ___?_.

APPENDIX B--GLOSSARY

Ambient Water Quality--The existing environmental condition of the water in a receiving water body.

Ammonia--Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

Average Monthly Discharge Limitation--The average of the measured values obtained over a calendar month's time.

Beneficial Use – The use of reclaimed water, that has been transported from the point of production to the point of use without an intervening discharge to the waters of the state, for a beneficial purpose.

Best Management Practices (BMPs)--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

 BOD_5 --Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD_5 is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act

Bypass--The intentional diversion of waste streams from any portion of the collection or treatment facility.

Chlorine--Chlorine is used to disinfect wastewaters of pathogens harmful to human health. It is also extremely toxic to aquatic life.

Compliance Inspection - Without Sampling--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance Inspection - With Sampling--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

Composite Sample--A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite" (collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

Construction Activity--Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

Continuous Monitoring –Uninterrupted, unless otherwise noted in the permit.

Distribution Uniformity--The uniformity of infiltration (or application in the case of sprinkle or trickle irrigation) throughout the field expressed as a percent relating to the average depth infiltrated in the lowest one-quarter of the area to the average depth of water infiltrated.

Engineering Report--A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in the Water Reclamation and Reuse Standards, WAC 173-240-060 or 173-240-130.

Fecal Coliform Bacteria--Fecal coliform bacteria are used as indicators of pathogenic bacteria in the effluent that are harmful to humans. Pathogenic bacteria in wastewater discharges are controlled by disinfecting the wastewater. The presence of high numbers of fecal coliform bacteria in a water body can indicate the recent release of untreated wastewater and/or the presence of animal feces.

Groundwater Recharge Criteria – The contaminant criteria found in the drinking water quality standards adopted by the state board of health pursuant to chapter 43.20 RCW and the department of health pursuant to chapter 70.119A RCW.

Grab Sample--A single sample or measurement taken at a specific time or over as short period of time as is feasible

Industrial Wastewater--Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

Maximum Daily Discharge Limitation--The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Method Detection Level (MDL)-The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

pH--The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

Quantitation Level (QL)-- A calculated value five times the MDL (method detection level).

Reclaimed Water – Effluent derived in any part from sewage from a wastewater treatment system that has been adequately and reliably treated, so that as a result of that treatment, it is suitable for a beneficial use or a controlled use that would not otherwise occur and is no longer considered wastewater.

Sample Maximum -- No sample shall exceed this value.

Soil Scientist--An individual who is registered as a Certified or Registered Professional Soil Scientist or as a Certified Professional Soil Specialist by the American Registry of Certified Professionals in Agronomy, Crops, and Soils or by the National Society of Consulting Scientists or who has the credentials for membership. Minimum requirements for eligibility are: possession of a baccalaureate, masters, or doctorate degree from a U.S. or Canadian institution with a minimum of 30 semester hours or 45 quarter hours professional core courses in agronomy, crops or soils, and have 5,3,or 1 years, respectively, of professional experience working in the area of agronomy, crops, or soils.

Surface Percolation – The controlled application of water to the ground surface for the purpose of replenishing ground water.

State Waters--Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater--That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

Technology-based Effluent Limit--A permit limit that is based on the ability of a treatment method to reduce the pollutant.

Total Coliform Bacteria—Coliform bacteria are used as indicators of pathogenic bacteria in the effluent that are harmful to humans. Pathogenic bacteria in wastewater discharges are controlled by disinfecting the wastewater. A microbiological test is used to detect and enumerate the total coliform group of bacteria in water samples.

Total Dissolved Solids--That portion of total solids in water or wastewater that passes through a specific filter.

Total Suspended Solids (TSS)--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill

fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Water Quality-based Effluent Limit--A limit on the concentration of an effluent parameter that is intended to prevent pollution of the receiving water.

APPENDIX C--TECHNICAL CALCULATIONS

APPENDIX D--RESPONSE TO COMMENTS